

1 ALICE K. HERBOLSHEIMER, ESQ.  
2 Nevada Bar No. 6389  
3 LEWIS BRISBOIS BISGAARD & SMITH LLP  
4 5555 Kietzke Lane, Suite 200  
5 Reno, Nevada 89511  
6 775.827.6440  
7 FAX: 775.827.9256  
8 Email: [Alice.Herbolsheimer@lewisbrisbois.com](mailto:Alice.Herbolsheimer@lewisbrisbois.com)

9  
10 Attorneys for National General Assurance  
11 Company

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NATIONAL GENERAL ASSURANCE  
COMPANY,

Plaintiff,

vs.

DWAINE ROCKWOOD TURNER, an  
individual; DOES I-V,

Defendants.

CASE NO. 2:19-cv-01713

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE OPPOSITION  
AND REPLY TO MOTIONS FOR  
SUMMARY JUDGMENT  
(Third Request)**

Intervenor, Helal Sekder (“Sekder”), filed a Motion for Summary Judgment Regarding Coverage on 1/10/20. Plaintiff, National General Assurance Company (“NGAC”) filed an Opposition to Sekder’s MSJ on 1/30/20. Additionally, NGAC filed a Counter-Motion for Summary Judgment Regarding Coverage on 1/31/20.

The parties had previously stipulated and obtained court approval to extend the time for Sekder to file his Reply in Support of his Motion for Summary Judgment and his Opposition to NGAC’s Counter-Motion for Summary Judgment, to March 13, 2020 and March 23, 2020, respectively. The purpose of the extension was to enable NGAC to effectuate a substitution of counsel and to allow the parties to further explore settlement potential before incurring additional time and expense to finish briefing the pending motions.

The parties subsequently filed a second stipulation to extend the filing deadlines for another 30 days, to April 13, 2020 and April 23, 2020, due to an unanticipated delay in getting the file

1 transferred from NGAC's former counsel to its new counsel. Additionally, the file was nearly 4,500  
2 pages, and new counsel needed additional time to review the file in order to fully evaluate Sekder's  
3 settlement demand.

4 Since then, counsel for the parties have engaged in good faith settlement negotiations, and a  
5 counteroffer has been made by NGAC to Sekder. Sekder's counsel is working to negotiate with  
6 various lienholders before deciding whether to accept NGAC's settlement offer. However, due to  
7 the current COVID-19 crisis, with many businesses either closed or operating with a skeleton crew,  
8 additional time will be necessary to negotiate the medical liens. Accordingly, the parties hereby  
9 stipulate to extend the deadlines for another 30 days, to May 13, 2020 and May 23, 2020,  
10 respectively, for Sekder to file his Reply in Support of his Motion for Summary Judgment and his  
11 Opposition to NGAC's Counter-Motion for Summary Judgment.

12 This is the parties' third request for an extension of time, and it is being made in good faith  
13 and not for any improper or dilatory purpose.

14 DATED this 9th day of April, 2020.

DATED this 9th day of April, 2020.

15 */s/ Jesse M. Sbaih*  
16 By: \_\_\_\_\_  
Jesse M. Sbaih, Esq.  
17 JESSE SBAIH & ASSOCIATES, LTD.  
The District at Green Valley Ranch  
18 170 South Green Valley Parkway, Suite 280  
Henderson, NV 89012

20 Attorneys for Intervenor, Helal Sekder

15 */s/ Alice K. Herbolsheimer*  
16 By: \_\_\_\_\_  
Alice K. Herbolsheimer, Esq.  
17 LEWIS BRISBOIS BISGAARD &  
SMITH LLP  
5555 Kietzke Lane, Suite 200  
Reno, Nevada 89511

20 Attorneys for Plaintiff, NGAC

21 IT IS SO ORDERED.

22   
23 RICHARD F. BOULWARE, II  
24 UNITED STATES DISTRICT JUDGE

25 DATED this 10th of April, 2020.

## **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP Rule 5(b), I certify that I am an employee of LEWIS BRISBOIS  
3 BISGAARD & SMITH LLP and that on this 9th day of April, 2020, I caused a true and correct copy  
4 of **STIPULATION AND ORDER TO EXTEND TIME TO FILE OPPOSITION AND REPLY**  
5 **TO MOTIONS FOR SUMMARY JUDGMENT (Third Request)** to be served via the court's  
6 electronic system to the following:

7 Jesse M. Sbaih, Esq.  
8 JESSE SBAIH & ASSOCIATES, LTD.  
9 The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, NV 89012

10 Thomas E. Winner, Esq.  
11 Steven C. Devney, Esq.  
12 WINNER & SHERROD  
1117 South Rancho Drive  
Las Vegas, Nevada 89102

By /s/ Sherie Morrill  
An Employee of  
LEWIS BRISBOIS BISGAARD & SMITH LLP